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**Via ECF**

August 2, 2024

The Honorable Robyn F. Tarnofsky  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
500 Pearl Street, Room 703  
New York, NY 10007

Application granted.

Date: 08/05/2024  
New York, NY

SO ORDERED

  
ROBYN F. TARNOFSKY  
UNITED STATES MAGISTRATE JUDGE

Re: John Ransley v. 150 West 21st LLC et al., 24-cv-01730(GHW)(RFT)  
Discovery Status Update Letter

Dear Judge Tarnofsky:

Mobilization for Justice, Inc. (“MFJ”) represents John Ransley, the Plaintiff in the above-referenced case. I submit this Status Update Letter pursuant to the parties’ Case Management Plan and Report on Rule 26(f) Conference, dated May 17, 2024 (“Case Management Plan”).

Pursuant to the Case Management Plan, on June 6, 2024, the parties provided their Rule 26(a)(1) disclosures. On June 14, 2024, Plaintiff served his First Set of Document Requests and First Set of Interrogatories. On July 22, 2024, Plaintiff served deposition notices and subpoenas, and, through counsel, simultaneously inquired about the Defendants’ failure to produce documents or provide interrogatory responses that were due on July 19, 2024. Counsel to Defendants advised that Defendants’ employee Mitchell Rothken, who served as counsel’s main point of contact for this matter, passed away and that Defendants required more time for production and to confirm dates for depositions. On August 1, 2024, counsel to the parties then had an informal telephonic conference, at which it was agreed that, subject to the Court’s approval, Defendants could have until August 31, 2024 to respond to Plaintiff’s document demands and interrogatories. The parties currently expect that depositions can still be completed by September 30, 2024.

Accordingly, the parties respectfully request that the Court modify the Case Management Plan to allow Defendants to provide responses to Plaintiff’s document requests and interrogatories by August 31, 2024. By submitting this letter, Plaintiff does not waive and specifically reserves the right to seek a pre-motion discovery conference pursuant to Local Rule 37.2 should the need arise.

Respectfully submitted,

/s/  
Matthew Longobardi  
Senior Staff Attorney

cc: Dean Dreiblatt, Esq. (via ECF)  
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*Attorneys for Defendants*